

EPA Jacket 71297-3

Vol.3

Note to next RAL - label language needs updating
see below

Burnett, Gina

From: Foss, Steve (AGR) <SFoss@agr.wa.gov>
Sent: Tuesday, September 18, 2018 1:39 PM
To: Hollis, Linda; Bryceland, Andrew; Greene, Cheryl; Burnett, Gina; Maignan, Tawanda
Cc: Davis, Kelle (AGR)
Subject: FW: 71297 - update respirator cartridges on labels
Attachments: 71297-2_SmartFresh Technology_20130123_1_71297_.pdf; EFSA Scientific Report_2005_Conclusion peer reefsa.2005.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

GB 9/19/2018

WSDA has notified AgroFresh that the respirator statement on various SmartFresh labels should be updated (see email below from Garnet Cooke, Pesticide Coordinator

Department of Consumer and Business Services/Oregon OSHA, 350 Winter Street NE, Salem OR 97301-3882).

If we understand a 2002 Science Review correctly, this assessment seems to assume that no workers were present while treatment with 1-MCP (EthylBloc) was in progress based on the Reviewer's Notes ...*the label prohibits workers from being present and/or entering a storage chamber while treatment is in progress, and workers may not re-enter a treated storage chamber until after the chamber has been vented.*"

Science Review in Support of a Label Amendment and a Petition (Petition No. 0F06144) for an Exemption From the Requirements of Tolerances for EthylBloc™ (EPA Reg. No. 071297-1) Containing 0.14% 1-Methylcyclopropene (Chemical No. 224459). Review of Acute and Subchronic Toxicity Studies and Other Human Health Data/Information. DP Barcode D281146; Case No. 063215; Submission No. S610458; MRIDs 456090 01 to -04; June 18, 2002

The label for EthylBloc™ (EPA Reg. No. 71297-1) states "*EthylBloc® technology is a powder that, when mixed with a Mixing/Buffer solution or water, releases a gas to extend the life and usefulness of many fresh cut flowers, potted flowers, bedding, nursery and foliage plants. **Plants are treated with this gas in enclosed areas such as rooms, coolers, greenhouses, truck trailers and shipping boxes/containers. This product is intended for use only on ornamental, non-food crops. Do not use outdoors or in other non-enclosed areas.***"

Applicators and mixers of EthylBloc™ (EPA Reg. No. 71297-1) are required to wear a respirator and other PPE as specified under the Precautionary Statements.

*"As a general precaution **when exposed to a gas, for activities in enclosed areas wear a respirator** with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC- 23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)".*

The second requirement under TREATMENT INSTRUCTIONS listed before the mixing instructions is "Wear all Personal Protective Equipment (PPE) required under Precautionary Statements". The 5th requirement under TREATMENT INSTRUCTIONS is to leave the treatment area immediately following the addition of EthylBloc to the Mixing/Buffer Solution.

According to the EFSA Scientific Report (2005), *ten percent of 1-MCP inhaled into the lungs on each breath was absorbed... However, two impurities, 1-chloro-2-methylpropene (1-CMP) and 3-chloro-2-methylpropene (3-CMP), evident at a low concentration, are reported to give positive results in genotoxicity studies and are carcinogenic. Thus, a classification of 1-MCP as T; R46 is proposed. In the short-term toxicity studies, effects on red blood cells were observed. Other target*

organs of 1- MCP toxicity were the liver and kidneys. The overall population of WBCs in males appeared to be increased in treated animals at the highest concentration used (see attached).

The current EPA accepted label for SmartFresh SmartTabs (EPA Reg. No. 71297-3) **does not specifically prohibit workers from being present while treatment is in progress and does not require a respirator during mixing or treatment with the 1-MCP gas.**

- This label directs applicators to *“Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh and ensure it maximum efficacy.”*
- In addition, the recommendations for SmartFresh SmartTabs explains that the product will start to release (e.g. the 1-MCP gas) in 5 minutes on their website at <http://agrofresh.octochemstore.com//docs/use/SmartFresh%20SmartTabs%20Use%20Instructions%202018.pdf>.
 - **IMPORTANT:** Before adding the tablets to the liquid, make sure you are ready to complete steps 7, 8 and 9 quickly, as the product will start to release in 5 minutes.
- Ventilation is a labeling requirement on the current EPA accepted label for SmartFresh SmartTabs (EPA Reg. No. 71297-3). Section 2(ee) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and General Pesticide Rule WAC 16-228-1225 allow pesticide users to apply pesticides under certain limited conditions that are not specified on a pesticide label. Section 2(ee) allows that a pesticide may be applied by any method not prohibited by the label (unless the label specifically states the pesticide may be applied only by the methods specified on the label). However, written recommendations are considered “labeling” and must be consistent with FIFRA requirements and the section 3 label.

An AgroFresh brochure (written recommendation) for SmartFresh SmartTabs includes instructions for the construction of a simple, smaller-scale (2 bin) treatment chamber (see <https://agrofresh.octochemstore.com/docs/use/SmartFresh%20SmartTabs%20Brochure%202018.pdf>). The registrant claims duct tape may be used on plastic sheeting to create airtight chambers in various sizes, depending on a person’s needs and available space. This recommendation does not appear to include any instructions for venting following treatment with the 1-MCP gas.

Our Compliance Program reviewed the label and video from NC State and provided some initial comments.

1. Ventilation from the small chamber would take place into the building that houses the chamber rather than to the environment outside of the building.
 - a. One way to ventilate properly would be to use flexible ducting similar to that used in fumigation aeration to vent the air in the chamber to the atmosphere outside of the building.
2. Some form of ventilation precautions should be noted on the brochure.

The current label for SmartFresh™ ProTabs, PINK (EPA Reg. No. 71297-10) does not specially prohibit the mixer/applicator from being present while treatment is in progress. The label requires the mixer/applicator to **“Leave the area immediately. Be sure to complete all additions within 5 minutes.”** The label for SmartFresh ProTabs, PINK (EPA Reg. No. 71297-10) does not require an appropriate respirator during mixing or treatment. The SmartFresh ProTabs, PINK instructions for use in enclosed spaces (such as storage rooms, coolers, shipping containers, enclosed truck trailers or similar) currently allows workers to be present in enclosed spaces without a respirator.

Set the ProPack on a stable surface. Tear off the closure strips at the top of the pouch, and at the top of the ProTabs package. Drop ALL the tablets from the package directly into the solution. Leave the area immediately. Be sure to complete additions of all tablets within 5 minutes.

URL Reference: <http://agrofresh.octochemstore.com//docs/use/SmartFresh%20ProTabs%20Pink%20200ml%20Use%20Instructions%202018.pdf>

We understand there is a large calculated Margin of Safety associated with the use of 1-MCP if applicators follow the label. However, the references above indicate there may be an increase potential for exposure (greater than zero) to 1-MCP and impurities in SmartFresh products, if workers are not wearing an appropriate respirator when mixing or treatment is in progress in enclosed spaces. It would seem reasonable to assume that giving a person more than 5 minutes to exit an enclosed space previously treated with 1-MCP (e.g. SmartFresh™ ProTabs, PINK (EPA Reg. No. 71297-10)) could reduce the potential exposure to 1-MCP gas.

Thank you for your consideration.

Regards,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

From: Foss, Steve (AGR)
Sent: Tuesday, September 11, 2018 1:47 PM
To: Ann Beaulieu <abeaulieu@agrofresh.com>
Subject: 71297 - update respirator cartridges on labels

Ann:

It looks like the respirator statement on the labels below should be updated.

- SmartFresh Technology (EPA Reg. No. 71297-2) 20160112 EPA
- SmartFresh SmartTabs (EPA Reg. No. 71297-3) 20160108 EPA.
- SmartFresh ProTabs-Pink (EPA Reg. No. 71297-10) 20160119 EPA.

Regards,
Steve

From: COOKE Garnet R * DCBS [<mailto:Garnet.R.Cooke@oregon.gov>]
Sent: Tuesday, September 11, 2018 12:38 PM
To: Foss, Steve (AGR) <SFoss@agr.wa.gov>
Subject: RE: <https://www.epa.gov/sites/production/files/2016-02/documents/chap-10-feb-2016.pdf>

➤ **DECODE:**

Translation KEY to the revised 1995 NIOSH certification standards and language changes:

| Outdated EPA (NIOSH) language | | Current NIOSH language |
|------------------------------------|---|---|
| NIOSH/MSHA | ➡ | NIOSH |
| Dust/Mist | ➡ | Particulate |
| Pre-filter approved for pesticides | ➡ | N, R or P filters to be used in combination with a chemical cartridge |
| Canister approved for pesticides | ➡ | Canister (protects against chemical of concern.) |
| N, R, P or HE filters | ➡ | N, R or P (HE filters can only go on PAPRs.) |

From: Foss, Steve (AGR) [mailto:SFoss@agr.wa.gov]

Sent: Tuesday, September 11, 2018 12:28 PM

To: COOKE Garnet R * DCBS

Subject: <https://www.epa.gov/sites/production/files/2016-02/documents/chap-10-feb-2016.pdf>

<https://www.epa.gov/sites/production/files/2016-02/documents/chap-10-feb-2016.pdf>

That's the old language.

- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

This is the 'decoded' version:

+A NIOSH approved respirator with an organic vapor cartridge with a combination N, R or P filter NIOSH approval prefix TC-84A; or a NIOSH approved gas mask with organic vapor canister NIOSH approval prefix TC-14G.

A TC-84A means anything with a particulate component. (These are NOT related to the one above, just an example.)

Why COMPONENTS Matter: NIOSH APPROVAL TC-84A



Filtering facepiece **P 100**



Elastomeric half face **P100**



Elastomeric half face **N-95**



Elastomeric half face **OV + N95**



Elastomeric half- face **OV + N95**



Full face **OV + P100**

From: Foss, Steve (AGR)

Sent: Tuesday, September 11, 2018 7:50 AM

To: 'COOKE Garnet R * DCBS'

Subject: 71297 Should the respirator be a NIOSH-approved TC-84A respirator for use of SmartFresh products (1-methylcyclopropene)?

Hi Garnet,

The products below contain 1-methylcyclopropene as the active ingredient.

- SmartFresh Technology (EPA Reg. No. 71297-2) 20160112 EPA
- SmartFresh SmartTabs (EPA Reg. No. 71297-3) 20160108 EPA.
- SmartFresh ProTabs-Pink (EPA Reg. No. 71297-10) 20160119 EPA.

SmartFresh™ Technology is a powder that, when mixed with water in a proprietary generating system, releases the volatile active ingredient 1-methylcyclopropene (1-MCP).

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh in enclosed spaces, such as storage rooms, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed spaces. These enclosed treatment spaces must be air tight as leakage will reduce SmartFresh effectiveness.

SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP).

The PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

QUESTION: Tom Hoffman from our compliance program asked if the respirator should be a NIOSH-approved TC-84A respirator. Any exceptions (e.g. PAPR)?

Thank you,

Steve L. Foss, Program Specialist
Washington State Dept of Agriculture
P.O. Box 42589 Olympia, WA 98504
P: 360-902-2049; fax: 360-902-2093
Email: sfoss@agr.wa.gov

PROCESSING REQUEST

Reg # 71297-3

Decision # 509524

Description: amended phone numbers & first aid box instructions

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☒ Dated: 8 Jan 2016

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☐ New CSF(s) Dated:

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Cody Kendrick

Division: BPPD

Phone: (703) 347-0469

Date: 8 Jan 2016



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 8, 2016

Dr. Ann Beaulieu
Director, Regulatory Affairs
AgroFresh, Inc.
400 Arcola Road, PO Box 7000
Collegeville, PA 19426

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – amended
phone numbers and instructions in first aid box
Product Name: SmartFresh SmartTabs
EPA Registration Number: 71297-3
Application Date: 18 September 2015
OPP Decision Number: 509524

Dear Dr. Beaulieu:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false

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EPA Reg. No. 71297-3
OPP Decision No. 509524

or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Cody Kendrick of my team by phone at (703) 347-0468 or via email at kendrick.cody@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Andrew C. Bryceland". The signature is fluid and cursive, with the first name "Andrew" and last name "Bryceland" clearly legible.

Andrew Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

MASTER LABEL

SmartFresh™ SmartTabs

Sublabel A: Commercial ornamental

Sublabel B: Fruit and Vegetables (Non-Agricultural Use)

ACTIVE INGREDIENT:

1-Methylcyclopropene:0.63%

OTHER INGREDIENTS:99.37%

Total:100.0%

ACCEPTED

01/08/2016

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 71297-3

KEEP OUT OF REACH OF CHILDREN

CAUTION

Manufactured by:
AgroFresh, Inc.
400 Arcola Road, PO Box 7000
Collegeville, PA 19426
1-866-206-1001

EPA Reg. No. 71297-3
EPA Est. No. 707-WA-001

Lot No.

SUBLABEL A: Commercial ornamental

| | |
|----------------------------------|--|
| SmartFresh™ SmartTabs | AgroFresh Inc. 400 Arcola Road, PO Box 7000 Collegeville, PA. 19426 Tel: (866) 206-1001 |
|----------------------------------|--|

Protects ornamentals from the various effects of ethylene.

Active Ingredient:

1-Methylcyclopropene.....0.63%

Other Ingredients: 99.37%

Total: 100.0%

Keep Out Of Reach Of Children

CAUTION

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

| FIRST AID | |
|---|---|
| If inhaled | <ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for treatment advice. |
| If on skin or clothing | <ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15- 20 minutes.• Call a poison control center or doctor for treatment advice |
| If in eyes | <ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice. |
| If swallowed | <ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person. |
| POISON CONTROL CENTER 1-800-222-1222 | |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For general information on product use, etc., call the National Pesticides Information Center at 1-800-858-7378. For emergencies, call the poison control center 1-800-222-1222. | |

<Mat id/spec id>

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

71297-3 SmartFresh™ SmartTab
AgroFresh Inc. BW, 04JAN2016
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Net Contents:

| Tablets | Ounces | Grams | Tablets | Ounces | Grams | Tablets | Ounces | Grams |
|---------|--------|-------|---------|--------|-------|---------|--------|-------|
| 1 | 0.044 | 1.25 | 11 | 0.484 | 13.75 | 21 | 0.924 | 26.25 |
| 2 | 0.088 | 2.5 | 12 | 0.528 | 15 | 22 | 0.968 | 27.5 |
| 3 | 0.132 | 3.75 | 13 | 0.572 | 16.25 | 23 | 1.012 | 28.75 |
| 4 | 0.176 | 5 | 14 | 0.616 | 17.5 | 24 | 1.056 | 30 |
| 5 | 0.22 | 6.25 | 15 | 0.66 | 18.75 | 25 | 1.1 | 31.25 |
| 6 | 0.264 | 7.5 | 16 | 0.704 | 20 | 26 | 1.144 | 32.5 |
| 7 | 0.308 | 8.75 | 17 | 0.748 | 21.25 | 27 | 1.188 | 33.75 |
| 8 | 0.352 | 10 | 18 | 0.792 | 22.5 | 28 | 1.232 | 35 |
| 9 | 0.396 | 11.25 | 19 | 0.836 | 23.75 | 29 | 1.276 | 36.25 |
| 10 | 0.44 | 12.5 | 20 | 0.88 | 25 | 30 | 1.32 | 37.5 |

Lot No.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and other handlers must follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in the box only apply to uses of this product that are covered by the Worker Protection Standard.

REI: Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment area. For enclosed areas including but not limited to storage rooms, coolers, shipping containers, enclosed truck trailers, ventilation shall continue until after thirty minutes (30) minutes of using fans or other mechanical ventilating system. In greenhouses, two (2) hours of ventilation using fans or other mechanical ventilating systems or four (4) hours of ventilation using vents, windows or other passive ventilation.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, prior to venting the volatile active ingredient from the treatment area is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

REI: Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment area. For enclosed areas including but not limited to storage rooms, coolers, shipping containers, enclosed truck trailers, ventilation shall continue until after thirty minutes (30) minutes of using fans or other mechanical ventilating system. In greenhouses, two (2) hours of ventilation using fans or other mechanical ventilating systems or four (4) hours of ventilation using vents, windows or other passive ventilation.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

PRODUCT INFORMATION

SmartFresh™ is a unique tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on ornamentals, including fresh cut flowers, potted flowers, bedding, nursery and foliage plants. By counteracting ethylene, SmartFresh™ provides many benefits to ornamentals during transport and storage including:

- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying senescence
- Reducing chilling injury
- Reducing premature flower death
- Reducing premature leaf and flower drop and leaf yellowing

SmartFresh™ is used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions.

Ornamentals must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Cut Flowers, Potted Flowers, Bedding, Nursery and Foliage Plants

SmartFresh™ treatment benefits many flowers and plants such as, but not limited to:

Achillea, Aconitum, Agapanthus, Alchemilla, Allium, Alstroemeria, Alyssum, Aphelandra, Aquilegia, Asclepias, Astrantia, Asparagus fern, Azalea, Begonia, Bouvardia, Brassia (Schefflera), Brodiaea (Triteleia), Calathea, Campanula, Carnation, Celosia, Centaurea, Chamaedorea, Chelone, Coleus, Cordyline, Cymbidium, Crocosmia (Montbretia), Daucus (Queen Annes Lace), Delphinium, Dendrobium, Dianthus, Dicentra, Dizygotheca, Doronicum, Echium, Eremurus, Eustoma, (Lisianthus), Ficus, Freesia, Fuchsia, Geranium, Gladiolus, Godetia, Gypsophila, Hibiscus, Ilex (Holly), Impatiens, Ixia, Kalanchoe, Kniphofia, Lavatera, Lily, Lysimachia, Miniature Carnation, Monkshood, Pelargonium, Petunia, Philodendron, Phlox, Physostegia, Poinsettia, Radermachera, Rose, Rudbeckia, Salvia, Saponaria, Scabiosa, Silene, Snapdragon, Solidaster, Stock, Streptocarpus, Sweet William, Trachelium, Trollius, Veronica, Wax Flower, and Zygocactus.

Timing of application

SmartFresh™ is used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. Flowers and plants are treated whether or not they may have been previously treated with SmartFresh or another anti-ethylene product. Additional applications are beneficial for prolonged storage periods and for some species with more than one flower per stem (i.e. snapdragons, delphiniums, miniature carnations, and alstromeria) and flowers at different stages of development on the same plant (i.e. geraniums, impatiens, and azaleas).

Plants being held for shipment in enclosed areas are easily treated with SmartFresh™. For example, non-boxed sleeved potted plants and cut flowers (held dry or in solution), or boxed plants and cut flowers with the lids and/or precooling vents completely open and directly exposed to the surrounding atmosphere can be treated. Bedding or potted plants on movable racks are also easily treated.

Application Method and Rate

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be 10 x 20 x 12 = 2400 cubic feet. To calculate the height measurement for greenhouses with a peaked roof, use one half of the sum of the height at the peak plus the height at the wall.

b) Choose the correct number of **Green** SmartFresh™ SmartTabs according to the size of the area as follows.

Use one GREEN tablet per 150 cubic feet of treatment area or
For 20 foot truck container use 7 GREEN tablets
For 40 foot truck container use 14 GREEN tablets

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.
Always use two (2) Blue tablets for EACH Activator Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container/Greenhouse

To be used with SmartFresh™, rooms/containers/trailers/greenhouses must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All room/trailer/container/greenhouse drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the ornamentals to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST four (4) hours for ornamentals treated at >55F and for at least ten (10) hours for ornamentals treated at or below 55F.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated area by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. For greenhouses, vent the treated area by opening doors and windows for a minimum of two hours with continued full internal ventilation or four hours with passive ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal

facility. Store treated ornamentals not intended for immediate sale according to standard commercial practices.

Restrictions

Do not split tablets. Use whole tablets only.

Do not smoke during the SmartFresh™ application.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse of equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY AND DISCLAIMER

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. To the extent permitted by applicable law, risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc.
U.S. Patents 5,518,988, 6,017,849 and 6,762,153

AgroFresh Inc.
400 Arcola Road, PO Box 7000
Collegeville, PA 19426
1-866-206-1001

SUBLABEL B: Fruit and vegetables

| | |
|----------------------------------|---|
| SmartFresh™ SmartTabs | AgroFresh Inc. 400 Arcola Road, PO Box 7000 Collegeville, PA 19426 Tel: (866) 206-1001 |
|----------------------------------|---|

Protects harvested fruit and vegetables from the various effects of ethylene.

Active Ingredient:

1-Methylcyclopropene.....0.63%

Other Ingredients: 99.37%

Total: 100.0%

Keep Out Of Reach Of Children

CAUTION

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

| FIRST AID | |
|---|---|
| If inhaled | <ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for treatment advice. |
| If on skin or clothing | <ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15- 20 minutes.• Call a poison control center or doctor for treatment advice |
| If in eyes | <ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice. |
| If swallowed | <ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person. |
| POISON CONTROL CENTER 1-800-222-1222 | |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For general information on product use, etc., call the National Pesticides Information Center at 1-800-858-7378. For emergencies, call the poison control center 1-800-222-1222. | |

<Mat id/spec id>

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

71297-3 SmartFresh™ SmartTab
AgroFresh Inc. BW, 04JAN2016
Page 10 of 16

Net Contents:

| Tablets | Ounces | Grams | Tablets | Ounces | Grams | Tablets | Ounces | Grams |
|---------|--------|-------|---------|--------|-------|---------|--------|-------|
| 1 | 0.044 | 1.25 | 11 | 0.484 | 13.75 | 21 | 0.924 | 26.25 |
| 2 | 0.088 | 2.5 | 12 | 0.528 | 15 | 22 | 0.968 | 27.5 |
| 3 | 0.132 | 3.75 | 13 | 0.572 | 16.25 | 23 | 1.012 | 28.75 |
| 4 | 0.176 | 5 | 14 | 0.616 | 17.5 | 24 | 1.056 | 30 |
| 5 | 0.22 | 6.25 | 15 | 0.66 | 18.75 | 25 | 1.1 | 31.25 |
| 6 | 0.264 | 7.5 | 16 | 0.704 | 20 | 26 | 1.144 | 32.5 |
| 7 | 0.308 | 8.75 | 17 | 0.748 | 21.25 | 27 | 1.188 | 33.75 |
| 8 | 0.352 | 10 | 18 | 0.792 | 22.5 | 28 | 1.232 | 35 |
| 9 | 0.396 | 11.25 | 19 | 0.836 | 23.75 | 29 | 1.276 | 36.25 |
| 10 | 0.44 | 12.5 | 20 | 0.88 | 25 | 30 | 1.32 | 37.5 |

Lot No.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and other handlers must follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

REI: Thirty (30) minutes

Do not enter enclosed areas until the enclosed area has been vented unless wearing the appropriate PPE. Ventilation shall continue until after thirty (30) minutes of ventilation using fans or other mechanical ventilating systems.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

PRODUCT INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples

- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ is used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

Fruit And Vegetables

Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

Timing of Application

SmartFresh™ is added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. For best results, do not use with fruit previously treated with Ethephon. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. Fruit and vegetables may benefit from repeat application, such as when the crop has been exposed to ethylene. It must be emphasized that keeping the fruit and vegetables cool at all times and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the “turning black” stage. Only one application to the same fruit.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Kiwifruit: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Persimmons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Pears, Asian pears: Apply SmartFresh™ as soon after harvest as possible.

Peaches, nectarines, plums, plumcots, and apricots: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

Application Method and Rate

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be 10 x 20 x 12 = 2400 cubic feet.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs according to the size of the area and the commodity to be treated as follows.

Apple, Asian pear, avocado, broccoli:

Use one GREEN tablet per 120 cubic feet of treatment area

Pear: Use one GREEN tablet per 200 cubic feet of treatment area

Melon, tomato, kiwifruit, persimmon, peach, nectarine, plum, plumcot, apricot:

Use one GREEN tablet per 240 cubic feet of treatment area

Bananas: Use one GREEN tablet per 380 cubic feet of treatment area

For stressed bananas: increase dose up to a maximum of one GREEN tablet per 120 cubic feet of treatment area

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Activator Kit.

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

Check that:

- All room/trailer/container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
 - No missing rubber No large cracks
 - No plastic slat doors No roller top doors
 - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables, to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.
Always use both Blue tablets.
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours for avocado, banana, broccoli, kiwifruit, melon, persimmon and tomato, fifteen (15) hours for Asian pear, twenty four (24) hours for apple, nectarine, peach, pear, plum, plumcot and apricot.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twenty four (24) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose

of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated commodities not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

Restrictions

Do not split tablets. Use whole tablets only.

Do not smoke during the SmartFresh™ application.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original packaging in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse of equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY AND DISCLAIMER

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. To the extent permitted by applicable law, risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc.
U.S. Patents 5,518,988, 6,017,849 and 6,762,153

AgroFresh Inc.
400 Arcola Road, PO Box 7000
Collegeville, PA 19426
1-866-206-1001

71297-3 SmartFresh™ SmartTab
AgroFresh Inc. BW, 04JAN2016
Page 16 of 16

Receipt for Section 3

S: 974630

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Amendment

Fee For Service: ☐ Yes ☒ No

Billable: ☒ Yes ☐ No

Company: 71297 AGROFRESH INC.

V

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 71297-3

Product Name: SMARTFRESH SMARTTABS

Override#:

Me Too
Section3:

Me Too Product
Name:

Application Date: 18-Sep-2015



OPP Rec'd Date: 23-Sep-2015



Front End Date: 23-Sep-2015



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Label amendment.

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Paper Label

View/Edit

New Ingredient

Request Date:

New Ingredient

Received Date:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 24, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MS. ANN BEAULIEU
AGROFRESH INC.
400 ARCOLA ROAD, PO Box 7000
COLLEGEVILLE, PA 19426-

PRODUCT NAME: SMARTFRESH TECHNOLOGY
COMPANY NAME: AGROFRESH INC.
EPA FILE SYMBOL: 71297-2, 71297-3, 71297-4, 71297-5, 71297-6, 71297-10, 71297-11,
71297-12, 71297-13, 71297-14, 71297-15, 71297-16 and 71297-17
EPA RECEIPT DATE: 09/23/15

SUBJECT: RECEIPT OF AMENDMENTS

DEAR REGISTRANT:

The Office of Pesticide Programs has received your applications for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the applications appears to qualify for fast track review. The packages will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Biologicals & Pollution Prevention Division, PM Team 91, at (703) 305-6928.

Sincerely,

A handwritten signature in black ink, appearing to be "M. J. L.", written over a horizontal line.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

September 22, 2015

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Biopesticides and Pollution Prevention Division
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Subject: Amendments to thirteen (13) labels – Change to First Aid Box
EPA Registration Numbers 71297- 2,3,4,5,6,10,11,12,13,14,15,16,17
Active Ingredient = 1-Methylcyclopropene (1-MCP)

AgroFresh, Inc. is submitting amendments for thirteen approved materials. The amendment in each label is a modification of the phone numbers and instructions in the first aid box. The language is based on guidance from the US EPA Label Manual, Chapter 7, Section F. No supporting data is required and these amendments can therefore be considered fast track.

| EPA Registration Number | Registered EP or MUP |
|-------------------------|---------------------------------------|
| 71297-2 | SmartFresh |
| 71297-3 | SmartFresh SmartTabs |
| 71297-4 | Manufacturing-Use Product – SF |
| 71297-5 | EthylBloc Sachet |
| 71297-6 | AFxRD-038 |
| 71297-10 | SmartFresh ProTabs |
| 71297-11 | AF-2005 |
| 71297-12 | Manufacturing-Use Product – EB - 0.14 |
| 71297-13 | Manufacturing-Use Product – SF - 3.3 |
| 71297-14 | Manufacturing-Use Product – EB - .014 |
| 71297-15 | Manufacturing-Use Product – ST - 0.63 |
| 71297-16 | Manufacturing-Use Product – PT – 2.0 |
| 71297-17 | AF-701 |

The other changes shown in red, name, address and company phone number have been made per PR Notice 98-10, Section IV.D, non-notification.

For each of these registered labels, enclosed please find a completed application form (EPA Form 8570-1) and a proposed revised label with the changes shown in red (5 copies).

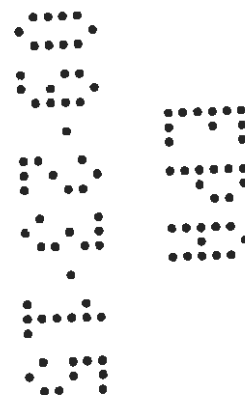
Please contact me if you have any questions regarding this submission. I can be reached by phone at 610-244-6630 or email at abeaulieu@agrofresh.com. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann Beaulieu".

Ann Beaulieu, Ph.D.
Director, Regulatory Affairs

Attachments





United States
Environmental Protection Agency
Washington, DC 20460

| | |
|---|-----------------------|
| <input type="checkbox"/> Registration | OPP Identifier Number |
| <input checked="" type="checkbox"/> Amendment | |
| <input type="checkbox"/> Other | |

Application for Pesticide - Section I

| | | |
|---|---|--|
| 1. Company/Product Number AgroFresh, Inc. / 71297-3 | 2. EPA Product Manager Linda Hollis | 3. Proposed Classification None X Restricted |
| 4. Company/Product (Name) SmartFresh™ SmartTab | PM# | |
| 5. Name and Address of Applicant (Include Zip Code) AgroFresh Inc. 400 Arcola Road, PO Box 7000 Collegeville, PA 19426 | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name | |

Section - II

| | |
|--|--|
| <input checked="" type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| Notification - Explain below. | <input type="checkbox"/> "Me Too" Application. |
| | Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Amended phone number and instructions in first aid box

Section - III**1. Material This Product Will Be Packaged In:**

| | | | |
|--|--|---|--|
| Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 2. Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack |
| * Certification must be submitted | If "Yes" Unit Packaging wgt. | No. per container | |
| | | | |

| | | |
|---|---|--|
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | 4. Size(s) Retail Container 1- 30 tablets (0.044 -1.32 oz) | 5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product |
|---|---|--|

| | |
|--|--------------------------------------|
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | <input type="checkbox"/> Other _____ |
|--|--------------------------------------|

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

| | | |
|----------------------|---------------------------------------|---|
| Name Ann Beaulieu | Title Director, Regulatory Affairs | Telephone No. (Include Area Code) 610-244-6630 |
|----------------------|---------------------------------------|---|

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

| | | |
|-------------------------------|-------------------------------|---|
| 2. Signature | Director, Regulatory Affairs | 6. Date Application Received (Stamped) |
| 4. Typed Name Ann Beaulieu | 5. Date September 18, 2015 | |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

August 29, 2014

I, Linda Hollis, Biochemical Pesticides Branch, Biopesticides & Pollution Prevention Division, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention, United States Environmental Protection Agency ("EPA"), certify that the pesticide product(s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Brazil) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Agro Fresh Inc.
400 Arcola Road
P. O. Box 7000
Collegeville, PA 19426

EPA Registration Number: 71297-3
Name of Product: SMARTFRESH SMARTTABS

A handwritten signature in black ink, appearing to read "Linda Hollis", is positioned above the typed name.

Linda Hollis
Risk Manager 91
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division
(7511P)





United States
Environmental Protection Agency
 Washington, DC 20460

Registration

OPP Identifier Number

Amendment

Other

X

Application for Pesticide - Section I

| | | |
|---|--|---|
| 1. Company/Product Number AgroFresh, Inc. / 71297-3 | 2. EPA Product Manager Linda Hollis | 3. Proposed Classification None Restricted |
| 4. Company/Product (Name) AgroFresh / SmartFresh™ SmartTabs | PM# 91 | |
| 5. Name and Address of Applicant (Include Zip Code) AgroFresh Inc./Rohm and Haas Company 400 Arcola Road Collegeville PA 19426 Check if this is a new address | | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name |

Section - II

Amendment - Explain below.

Final printed labels in response to
 Agency letter dated
 "Me Too" Application.

Notification - Explain below.

Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Please issue 5 GOLD SEAL letters confirming the registration of SmartFresh™ SmartTabs(71297-3) for Brazil.

Section - III

1. Material This Product Will Be Packaged In:

| | | | |
|---|---|--|---|
| Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | 2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Blister Pack |
| If "Yes" No. per Unit Packaging wgt. container | | If "Yes" No. per Package wgt container | |

* **Certification must
 be submitted**

| | | |
|--|--|---|
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | 4. Size(s) Retail Container 1-500 gallons | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product |
|--|--|---|

6. Manner in Which Label is Affixed to Product

☐ Lithograph
☐ Paper glued
☐ Stenciled

☐ Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

| | | |
|----------------------|---------------------------------------|---|
| Name Ann Beaulieu | Title Director, Regulatory Affairs | Telephone No. (Include Area Code) 610-244-6630 |
|----------------------|---------------------------------------|---|

Certification
 I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.
 I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both
 under applicable law.

6. Date Application
 Received

(Stamped)

| | |
|-------------------------------|--|
| 2. Signature | Title: Director, Regulatory Affairs |
| 4. Typed Name Ann Beaulieu | 5. Date 7/31/2014 |

Receipt for Section 3

S: 956883

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Print Letter

Application Type: Amendment

Fee For Service: ☒ Yes ☐ No

Enter More Information

Billable: ☒ Yes ☐ No

Tracking

Company: 71297 AGRO FRESH INC.

V

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 71297-3

Product Name: SMARTFRESH SMARTTABS

Override#:

Me Too

Me Too Product

Section3:

Name:

Application Date: 11-Aug-2014

OPP Rec'd Date: 21-Aug-2014

Front End Date: 26-Aug-2014

Risk Manager Send Date: 26-Aug-2014

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Gold Seal Certificate for Brazil

| Receipt Content | Des |
|-----------------|-----------|
| Other | Gold Seal |

View/Edit

Form A: ☐

Signature Date:

Form B: ☐

New Ingredient

Request Date:

New Ingredient

Received Date:

Signature Date:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 26, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-494669
EPA File Symbol or Registration Number: 71297-3
Product Name: SMARTFRESH SMARTTABS
EPA Receipt Date: 21-Aug-2014
EPA Company Number: 71297
Company Name: AGRO FRESH INC.

MS. ANN BEAULIEU
AGRO FRESH INC.
C/O ROHM AND HAAS COMPANY
400 ARCOLA ROAD, PO Box 7000
COLLEGEVILLE, PA 19426-

SUBJECT: Receipt of Request for Gold Seal Certification Letter(s)

Dear Registrant:

The Office of Pesticide Programs has received your request for Gold Seal Certification letter(s) that is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The action has been identified as action code M006:

UP TO 5 GOLD SEAL CERTIFICATION LETTERS PER REGISTRATION

No additional payment is due at this time. If you have any questions, please contact Betty Williams at (703) 308-0132.

Sincerely,

A handwritten signature in black ink, appearing to be "m. jh.", is written over the word "Sincerely,".

Front End Processing Staff
Information Technology & Resources Management Division

August 11, 2014

Document Processing Desk (REGFEE)
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard Room S-4900
2777 S. Crystal Drive
Arlington VA 22202

Subject: Gold Seal letters
EPA registration numbers 71297-1, 71297-2, 71297-3

Please issue 5 Gold Seal letters (each) confirming registration of the following three products for Brazil:

| | |
|---------|------------------------|
| 71297-1 | EthylBloc™ |
| 71297-2 | SmartFresh™ Technology |
| 71297-3 | SmartFresh™ SmartTabs |

Enclosed are the 8570-1 forms for each product. A check for \$789.00 (\$263.00 each) has been sent to St. Louis, MO.

If you have any questions, please contact me at 610-244-6630 or abeaulieu@agrofresh.com. Thank you.

Sincerely,



Ann Beaulieu, Ph.D.
Director, Regulatory Affairs

enclosures

Dow International Finance S.a.r.l.
Attn: Accounts Payable
2511 E Patrick Road
Midland, MI 48641-1286



2100184 01 SD T 3154 CKPR -P00184

PAGE 1 OF 1

08/11/14



US ENVIRONMENTAL PROTECTION AGENCY
1200 PENNSYLVANIA AVE NW
WASHINGTON DC 20460-000

Commercial/financial information may be entitled to confidential treatment

| YOUR INVOICE NO. | INVOICE AMOUNT | DISCOUNT / DEDUCTION | NET AMOUNT | INVOICE DATE | OUR DOCUMENT NO. | PAYMENT ON BEHALF OF |
|------------------|----------------|-------------------------|------------|-----------------|---------------------|----------------------|
| 20140731175822 | \$789.00 | \$0.00 | \$789.00 | 07/31/2014 | 2200059457 | AGROFRESH INC. |
| AGROFRESH 71297 | | | | | | |
| | | | TOTAL: | \$789.00 | | |

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS



Dow International Finance S.a.r.l.
Attn: Accounts Payable
2511 E Patrick Road
Midland, MI 48641-1286

62-20
311

CHECK # 2200059457 ATTACHED

No. 2200059457

08/11/14

\$\$\$\$\$\$\$\$\$\$\$789.00

NOT VALID AFTER 1 YEAR

Ronald C. Edmonds
AUTHORIZED SIGNATURE

PAYMENT ON BEHALF OF: SEE ATTACHED REMITTANCE ADVICE

PAY TO THE ORDER OF US ENVIRONMENTAL PROTECTION AGENCY
1200 PENNSYLVANIA AVE NW
WASHINGTON DC 20460-000

Seven Hundred Eighty-nine and 00/100 Dollars

CITIBANK, N.A.
ONE PENN'S WAY, NEW CASTLE, DE 19720

⑈ 2200059457 ⑈ ⑆031100209⑆



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